

Turner P. Smith
L.P. Harrison 3rd
Peter J. Behmke
CURTIS, MALLET-PREVOST, COLT & MOSLE LLP
101 PARK AVENUE
NEW YORK, NEW YORK 10178
*Attorneys for Lehman Brothers Holdings Inc. and
Certain of Its Affiliates*

Susheel Kirpalani
Andrew J. Rossman
James C. Tecce
Scott C. Shelley
QUINN EMANUEL URQUHART & SULLIVAN, LLP
51 MADISON AVENUE
NEW YORK, NEW YORK 10010
*Attorneys for Official Committee of Unsecured Creditors of
Lehman Brothers Holdings Inc.*

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

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In re : **Chapter 11 Case No.**
:
LEHMAN BROTHERS HOLDINGS INC., et al., : **08-13555 (SCC)**
:
:
Debtors. : **(Jointly Administered)**
-----X

**CERTIFICATE OF NO OBJECTION UNDER 28 U.S.C. § 1746 REGARDING
MOTION OF PLAN ADMINISTRATOR FOR ENTRY OF AN ORDER
AUTHORIZING LEHMAN BROTHERS SPECIAL FINANCING INC. TO
INVEST DISPUTED CLAIMS RESERVES PURSUANT TO SECTION 8.4
OF THE MODIFIED THIRD AMENDED JOINT CHAPTER 11 PLAN OF
LEHMAN BROTHERS HOLDINGS INC. AND ITS AFFILIATED DEBTORS**

Pursuant to 28 U.S.C. § 1746, and in accordance with this Court's case management procedures set forth in the Second Amended Order Pursuant to Section 105(a) of the Bankruptcy Code and Bankruptcy Rules 1015(c) and 9007 Implementing Certain Notice and Case Management Procedures [ECF No. 9635] (the "Second Amended Case Management Order"), the undersigned hereby certifies as follows:

1. On July 14, 2015, Lehman Brothers Holdings Inc. (“LBHI”), as Plan Administrator under the Modified Third Amended Joint Chapter 11 Plan of Lehman Brothers Holdings Inc. and its Affiliated Debtors (the “Plan”), together with the Official Committee of Unsecured Creditors (together with LBHI, the “Movants”), filed the Motion for Entry of an Order Authorizing Lehman Brothers Special Financing Inc. to Invest Disputed Claims Reserves Pursuant to Section 8.4 of the Modified Third Amended Joint Chapter 11 Plan of Lehman Brothers Holdings Inc., and its Affiliated Debtors [Docket No. 50296] (the “Motion”) and the Declaration Of William Montuoro In Support Of The Motion [Docket No. 50297] (the “Montuoro Declaration”).¹

2. In accordance with the Second Amended Case Management Order, the Plan Administrator established a deadline (the “Objection Deadline”) for parties to object or file responses to the Motion. The Objection Deadline was set for July 28, 2015 at 4:00 p.m. and was extended for Citibank, N.A. to July 30, 2015. The Second Amended Case Management Order provides that pleadings may be granted without a hearing, provided that no objections or other responsive pleadings have been filed on or prior to the relevant response deadline and the attorney for the entity who filed the pleading complies with the relevant procedural and notice requirements.

3. On July 30, 2015, the Movants filed a Notice of Filing of Transaction Documents and Revised [Proposed] Form of Order With Respect to the Motion. Attached as exhibits to that notice were (a) a revised spreadsheet used to calculate the amount of the secured note to be issued if the Motion is granted, (b) the form of Intercompany Note and Security Agreement, (c) the form of Control Agreement to be used in connection with the Motion, and (d) a revised proposed form of order, blacklined to show changes made to the order originally submitted with

¹ Capitalized terms used herein and not otherwise defined herein shall have the meanings ascribed to such terms in the Motion.

the Motion, reflecting the Movants' discussions with Citibank, N.A. and clarifying certain aspects of the requested relief.

4. The Objection Deadline for all parties has passed. To the best of my knowledge, no objection, responsive pleading, or request for a hearing has been (a) filed with the Court on the docket of the above-referenced cases in accordance with the procedures set forth in the Second Amended Case Management Order or (b) served on counsel to the Movants. Accordingly, the Movants respectfully request that the proposed order annexed hereto as Exhibit A be entered in accordance with the procedures described in the Second Amended Case Management Order.

I declare that the foregoing is true and correct.

Dated: August 3, 2015
New York, New York

Respectfully submitted,

CURTIS, MALLET-PREVOST, COLT &
MOSLE LLP

By: /s/ Peter J. Behmke
Turner P. Smith
L.P. Harrison 3rd
Peter J. Behmke
*Attorneys for Lehman Brothers Holdings Inc.
and Certain of Its Affiliates*

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SULLIVAN, LLP

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Susheel Kirpalani
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